

Exhibit 6

From: [Ele Hamburger](#)
To: [Payton, Gwendolyn](#); [Bedard, Stephanie](#)
Cc: [Daniel Gross](#); [Omar Gonzalez-Pagan](#); [Jenny Pizer](#)
Subject: CP v. BCBSIL -- Expert Witness Disclosure for Frank G. Fox, Ph.D.
Date: Friday, June 17, 2022 11:38:00 AM

Counsel,

Due to the ongoing discovery dispute and the re-noting of our Motion to Compel, our expert witness cannot complete his analysis regarding size of the proposed class and the likely number of claims avoided as a result of the gender affirming care exclusion administered by BCBSIL (in addition to denied claims). Had we received the discovery regarding the total population of the identified 398 plans, our expert would have been able to complete this analysis in a timely manner and to disclose his opinions today.

We will disclose this information as soon as possible after we receive the withheld discovery. Our anticipated expert is Frank G. Fox, Ph.D. I will provide his CV and list of cases in which he provided expert testimony at trial or deposition when we produce his report. Please let me know any questions you may have about this disclosure.

Sincerely yours,

Ele

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I am presently working remotely but regularly checking voice messages left on my direct line.